Before the
Federal Communications Commission
Washington, D.C. 20554

Comments of
The Small Company Coalition

IN RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Secretary, Federal
Communications Commission,

We at the Small Company Coalition (the "SCC" or Coalition") would like to begin by commending the Federal Communications Commission (the "FCC" or "Commission") on recognizing the importance of reducing unnecessary and harmful federal regulations, particularly those on small rural and Tribal broadband providers. As an organization comprised of small, rural, and Tribal telecommunications companies, the SCC has long sought to assist the FCC in the effort to eliminate unnecessary, outdated, and burdensome regulations. To the extent practical, the ultimate goal should be to unshackle the small broadband providers, thus enabling them to focus their limited resources on fulfilling the FCC's mandate of providing broadband services to the unserved/underserved residents living in the rural parts of the country.

We are particularly encouraged by the initiative demonstrated through the "Delete, Delete, Delete" public notice issued on March 12, 2025. The Coalition has a well-established history of advocating for regulatory reforms in alignment with the spirit of the public notice, and to this end, has met and corresponded with the FCC on various occasions[1].

This is a high-priority topic to our member companies, who serve remote locations across the nation, and whose primary objective is to provide first-rate communications services to our communities. Unfortunately, in recent years, there has been a strong regulatory trend wherein compliance requirements, federal filings, and other obligations have accumulated without any meaningful measures to evaluate the overall benefit produced by such items; likewise, until now, little action has been taken to streamline or eliminate unnecessary and outdated regulations, leaving small carriers such as ours bearing the burden of decades' worth of paperwork that has, in many cases, outlived its usefulness, if indeed it ever possessed any.

[1] For a list of the various filings over the years, refer to the SCC's website at this link: https://www.smallcompanycoalition.com/.

To illustrate the excessive requirements with which the small companies must comply, the Coalition has compiled a Federal Regulatory Compliance Calendar for 2025, utilizing the FCC's own estimates (where available) for burden hours incurred by each filing, and using our own estimates based on industry experience in the absence of any FCC estimate. In summary, the annual burden hours for a small rural carrier is conservatively estimated to be 603 (excluding the time to complete the semi-annual Broadband Data Collection filings discussed later in these comments), which stems from 391 pages in filings and 1,812 pages in instructions for those filings.

One must also bear in mind that these figures fail to take into account any state, local, or other regulatory obligations. For your convenience, we are providing this Calendar along with our comments, which is presented in the Attachment.

With these concerns in mind, we would like to draw your attention to several filings that we believe have transcended their original purpose or could be refined in order to be less cumbersome on small carriers:

1) **Form 499Q**

   Problem: Currently, there are five Form 499 filings each year, with quarterly filings (Form 499Q) due on the first of February, May, August, and November, and an annual filing (Form 499A) on April 1st. Worth noting is the fact that the level of fluctuation in each quarterly filing is fairly small on a percentage basis; for example, the Federal Universal Service Charge ("FUSC") contribution might be 33% one quarter, 34% the next quarter, 32% the following quarter, and so on.

   Recommendation: Due to the significant predictability of the quarterly fluctuations, it stands to reason that the quarterly filings could be reduced to once or twice per year at most, or even eliminated altogether and rely on the annual filing.

2) **Form 499A**

   Problem: The annual Form 499A filing is due on April 1st, and it serves as a true-up of the entire previous year Form 499Q filings based on the annual financial statements from said prior year. The timing on this filing can be futile for those companies that require an audit of their financial statements since their audit may not be completed until well after April 1st.

Recommendation: It would be most beneficial to shift the annual filing's due-date to a May or June timeframe in order to allow companies to finalize audit reports and use post-audit amounts, which best serves the actual intent of the annual filing. Furthermore, changes to a carrier's corporate officers must be reported to the Universal Service Administration Company ("USAC") via Form 499A within seven (7) business days after the change occurs. This requirement should be eliminated, and any officer updates should be reported through the annual filing of the Form 499A.

3) **Customer Proprietary Network Information ("CPNI")**

Problem: The CPNI protections serve a useful purpose, as safeguarding customers' data is of the utmost priority to our companies. However, the manner in which the current rules are written and the potential fines that may be levied simply due to missing a filing date—not necessarily from insufficient protocols, negligence, or malicious action leading to a data breach—are downright draconian. For example, according to the FCC's CPNI Enforcement Advisory, "Companies are reminded that failure to comply with the CPNI rules, including the annual certification requirement, may subject them to enforcement action, including monetary forfeitures of up to $251,322 for each violation for each day of a continuing violation, up to a maximum of $2,513,215. False statements or misrepresentations to the Commission may be punishable by fine or imprisonment under Title 18 of the U.S. Code."[2]

Recommendation: These potentially catastrophic fines for filing-related infractions should be significantly reduced and brought in line with other penalties that are more grounded in common sense. As a reference, violation of FCC Regulations—47 U.S.C. § 502, which also deals with privacy-related issues, incurs a maximum fine of $500 for each day on which a violation occurs. Additionally, the Commission should consider simplifying the CPNI rules for small providers (i.e., those providers with fewer than 50,000 customers) given the fact that such providers have been careful to protect the confidentiality of their customers' information and were not known for selling the information, which was the impetus behind the need for rules in the first place. With this in mind, in lieu of filing the annual certifications, a small provider could make a one-time certification filing (signed

[2] This statement is from the 2/14/2025 CPNI certification enforcement advisory, and references "47 U.S.C. § 503(b)(2)(B); see also 47 CFR § 1.80(b)(2); Amendment of Section 1.80(b) of the Commission's Rules, Adjustment of Civil Monetary Penalties to Reflect Inflation, Order, DA 25-5, 90 Fed. Reg. 3710 (Jan. 15, 2025)."

by an officer of the company) with the FCC, acknowledging the serious responsibility of treating CPNI records as confidential. The FCC could then require the submission of a new certification each time there is a change in a company's officers.

4) **Broadband Data Collection ("BDC")**

Problem: Although the estimated hours to complete the semi-annual BDC filing (due on March 1st and September 1st) were not readily available on the FCC and USAC websites, this is one of the more onerous and time-consuming filings.

Recommendation: While it is understood that the FCC considers the BDC filing and the related High-Cost Universal Broadband ("HUBB") filing to be important and necessary, for carriers that have experienced very little change in their network, consideration should be given to allow the BDC filing to be done on an annual basis consistent with the HUBB filing, which is due on March 1st, instead of semi-annually. Additionally, the BDC filing is very granular, and it should be determined whether all of the requested information is truly necessary and useful in determining the extent of broadband deployment in rural areas. More specifically, the Coalition recommends the following:

- Remove the location filing piece of the HUBB altogether, keep milestone certifications in place, and to the extent necessary, USAC can verify the milestone certifications using BDC data.
- Section 54.316 (a)(1) to (a)(9) of the HUBB rules should be deleted for the following reasons:
  - The Alternative Connect America ("ACAM"), the Rural Digital Opportunity Fund ("RDOF"), and pretty much all high-cost programs except for CAF Broadband Loop Support ("BLS") will be using the fabric as the primary data source to adjust locations.
  - BLS companies already receive fabric-based reviews of USAC's HUBB filed milestones.
  - USAC and the FCC already strongly encourage companies to reconcile the BDC and HUBB.
  - For Enhanced Alternative Connect America Cost Model ("EACAM") companies, they are just filing a literal list of fabric locations in the HUBB with speeds from now on, which is exactly what they're doing in the BDC.

- The Performance Measurement filing just takes a list of HUBB IDs that have been identified as having a subscriber and then runs a program to select from the list to get a test sample. That can be done using fabric IDs and there is already a process for that for EACAM companies.
- It would be easy for USAC to compare milestone certifications to public BDC data, and companies can certify to their percent completion based on their efforts preparing for the March 1st BDC filing.

- It is the Coalition's understanding that the whole point of the fabric and BDC process was to eliminate the HUBB at some point. The FCC needs to be more transparent about their reasons for denying challenges.

5) Form 481

Problem: Several items have been added to Form 481, including supply chain certifications. For many companies, this item is entirely irrelevant; for those whose hardware fell under the rip-and-replace requirements and subsequently fulfilled their obligations, the certifications attesting to this fact continue indefinitely.

Recommendation: The SCC recommends that Section 54.313 of the FCC's rules, and the associated Form 481 filing requirements, only apply to FCC-designated Eligible Telecommunications Carriers ("ETCs"). Firstly, state commissions have established processes, many of which are still in use despite the adoption of Section 54.313 and Form 481, to gather the information necessary that enable these commissions to discharge their duties under Section 54.314. If they wish to gather any additional information, such as what is required under 54.313, then they are free to do so. Secondly, much of the burden relates not to the inputting of Form 481 data into USAC's online system, but rather the subsequent filing of the form with the FCC and the relevant state commission or other governmental entity. In addition, should the Commission decide to continue with Section 54.313 and Form 481's filing requirements, then the SCC recommends the Commission undertake a detailed and public review of the need and efficacy of requiring Rate of Return ("RoR") regulated carriers to report certain financial information.

Again, considering the purpose of requiring ETCs to provide Form 481 to the relevant state commission/Tribal or other governmental entity to assist in discharging duties under Section 54.314, the privately-held RoR carrier financial data required does not appear to

meet this burden as state commissions already, to some extent, have access to this type of financial data or have the means of gaining access. Based on this, the SCC recommends that the Commission, at the very least, eliminate the burdensome requirement for privately-held RoR carriers to provide financial information in Form 481. Additionally, the FCC should implement a final verification for those carriers that have completed the removal of Chinese equipment under the rip-and-replace program.

6) **Form 395**

Problem: Form 395 serves no conceivable business purpose, as its primary objective is for companies to report the racial, gender, and ethnic statuses of their employees to the FCC. This sensitive personal information should not factor into any business decision made by the company, nor any regulatory action taken by the Commission.

Recommendation: This form should be eliminated entirely since reporting on the racial, gender, and ethnic attributes of a service provider's employees is irrelevant, and arguably discriminatory, to such provider's ability to provide telecommunications services.

7) **Performance Measurement Testing**

Problem: As the FCC is aware, broadband service providers that receive federal "High Cost" funds are required to test a random sample of customer locations to ensure that quality standards for speed and latency, or response time, are being met. The performance measurement testing is another example of a burdensome set of regulatory requirements that are increasing the cost of doing business both in time and money, without producing meaningful value to customers.

Recommendation: Since this costly requirement simply serves to prove that a broadband provider is delivering the Internet speed a customer is paying for, not only does it have no meaningful value, but it tends to confuse customers. The FCC should be cognizant of the fact that small companies often know their customers by name and if a customer thinks he or she is not getting the speed they're paying for, they will call the office and it's in the company's best interest to resolve the problem expeditiously. Additionally, in the event a small broadband provider is offering its service over fiber-to-the-home facilities, such provider should be exempt from the performance measurement testing altogether.

8) **Form 555**

Problem: The Form 555 no longer serves any purpose whatsoever since there is a national verifier process and carriers have been required to continue to file this annual Lifeline certification even though it contains no information.

Recommendation: The Form 555 is a glaring example of the tendency for a regulatory filing requirement to remain in place long after it no longer serves a meaningful purpose. Accordingly, simply stated, the Form 555 should be eliminated.

9) **Other**

Problem: An officer of a service provider must file numerous certifications throughout the year with the FCC, USAC, and/or the National Exchange Carrier Association ("NECA"). In fact, it's estimated that there are 37 certifications[3] that must be submitted at various times throughout the year, and in certain cases (e.g., the CPNI certification), there could be a substantial fine/penalty imposed for simply failing to submit a certification by the due-date, even though a carrier was otherwise in compliance with the regulatory requirement.

Recommendation: Combine multiple certification filings into one annual filing, which could be in the form of a checklist of all of the certifications to which a corporate officer must attest. In the event that there is a change in the certifying officer between annual filings, the new officer could be required to submit an updated combined certification filing within a set time period (e.g. 60 or 90 days) after he or she has replaced the previous certifying officer. Along these same lines, allow data-sharing between regulatory agencies and eliminate requirements to send copies of filings to multiple agencies (FCC/USAC/state).

We recognize that on certain items, the Commission issues its requirements based on Congressional mandates; nonetheless, we urge the FCC to exercise discretion in fulfilling these mandates by adopting a light-touch approach that keeps small companies and their communities in mind. Specifically, we'd like to draw the FCC's attention to the broadband nutrition labels and the Recordkeeping Compliance Certification and Contact Information Registry ("RCCCI").

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[3] This number was derived as follows: 12 monthly Lifeline certifications; 4 quarterly Form 499Q and 4 Performance Measurement testing certifications; and 17 annual (i.e., Form 499A, and NECA filings such as Forms 507, 508, 509, and CAF ICC) certifications.

While both of these items stem from Congressional directives, we believe that the FCC could provide substantial relief to small companies by trimming the reporting information and compliance requirements of each.

As the Commission is undoubtedly aware, the RCCCI requires service providers to demonstrate compliance with accessibility requirements for people with disabilities; this is a worthwhile cause, though there seems to be little logic behind filing this information every year, as it has an overwhelming tendency to be the same. In the absence of significant construction, office location changes, etc., one might reasonably expect compliance with these requirements to be achieved on a long-term basis once initially implemented. Therefore, **we request that the Commission transmute this form to a one-time filing** that only requires updating when a company's compliance status changes.

Similarly to the RCCCI, we understand that the broadband nutrition labels fulfill a Congressional mandate, and as such, it falls within their prerogative to sustain or remove them. However, while they persist, we believe that the FCC would be well-advised to simplify the requirements for these labels as much as possible. Any new reporting requirements should be viewed from a value-added perspective and evaluated against the time they take to complete. For example, we contend that the broadband nutrition labels offer little value to the end-user, who already has access to all relevant information containing their broadband connection. In the event the Commission wishes for companies to continue providing pricing, speed, and bundled packages information to customers, the Coalition recommends sending out a bi-annual billing insert outlining these options and/or recommending customers visit the company's website for this information. This would accomplish the same purpose.

Other Considerations:

We want to take this opportunity to bring the following additional matters to the FCC's attention.

1) **Telecommunications Relay Services ("TRS")**

   Problem: The TRS currently carries forward an amount upwards of $300M when the approximate monthly liability is $120M; what causes this excess, and what constitutes the $120M? Given that this program aims to assist the hearing impaired with originating or terminating calls, these numbers appear to be unduly high.

Recommendation: This charge is significant for many small carriers, and an IP solution should be pursued in its place.

2) **USAC Operating Efficiency**

Problem: In light of the efforts of the Department of Government Efficiency ("DOGE"), we want to addresses issues related to USAC's operating efficiency that we have brought to the FCC's attention in the past.[4] More specifically, the SCC has previously raised the issue of an apparent surplus in the USF, as identified in USAC's annual reports. However, coincidental though it may have been, shortly after the SCC began raising questions about this surplus, USAC stopped including its basic financial statements (i.e., a Balance Sheet, Statement of Operations or Statement of Income, and a Statement of Cash Flows) in its annual reports. Finally, USAC has earned a reputation in the industry for conducting highly inefficient audits that can take as long as several years to complete from start to finish.

Recommendation: Based on our review of its annual reports for the years 2021 through 2024, the FCC should inquire as to why USAC's total operating expenses have fluctuated so significantly in recent years, as demonstrated by the following table:

Year	Total Operating Expense
2020	204,479,047
2021	251,566,761
2022	328,882,254
2023	368,039,270
2024	324,069,905

Additionally, questions should be raised as to why USAC's Professional Fees line item has increased so dramatically, as demonstrated via the table below:

Year	Professional Fees Expense
2020	20,422,042
2021	40,535,785
2022	120,095,322
2023	133,170,561
2024	119,806,277

[4] See the SCC's comments regarding USAC at this link: https://www.smallcompanycoalition.com/_files/ugd/2df08a_f4d0669089b24ee8868b8add096d9b91.docx?dn=SCC%20-%20Report%20June%202017.docx

Furthermore, for transparency purposes, USAC should be required to include the basic financial statements referred to above in its annual report. Also, the specific fees paid to the various CPA firms that USAC has contracted with to conduct the audits of the universal service funding received by recipients should be disclosed, as opposed to its current practice of only including a range (i.e., $1-2M, $2-5M, and > $5M) of the total fees paid to the firms listed in its annual report[5], along with the number of audits each firm has been engaged to conduct.

With respect to the USAC audits, the following excerpt has been taken from a 2017 white paper sponsored by the SCC and prepared by the Alexicon Telecommunications Consulting, Inc.:

> Instead of continuing an obviously inefficient and cost-ineffective audit process, the SCC recommends the FCC heed its own advice and pay further attention to materiality concerns. In its recent Report and Order addressing the comprehensive review of the Part 32 Uniform System of Accounts, the FCC stated:
>
> > "We also agree with Alexicon that 'it would be beneficial to NECA and its pool members if the Commission adopted a definition of materiality that provided guidance related to NECA's review procedures.' Indeed, more particular guidance may be especially important for carriers receiving legacy universal service support because federal support is tied to the reported cost of such carriers. We adopt the general materiality guidelines promulgated by the Auditing Standards Board."[6]
>
> The SCC suggests a similar approach to ensuring the proper use of federal high-cost support funds. For example, the FCC could rely on independent auditors for testing compliance with certain USF rules and reporting results. Furthermore, the FCC should make more efforts to identify high-risk or known "bad actors" for audits and further review, instead of undergoing costly audits of the smallest companies with little or no chance for material recovery (due to the relatively small

[5] For an example, see page 14 of USAC's 2023 Annual Report found at this link: https://www.usac.org/wp-content/uploads/about/documents/annual-reports/2023/2023_USAC_Annual_Report.pdf. As a note, this list was excluded from USAC's 2024 Annual Report altogether.

[6] *In the Matter of Comprehensive Review of the Part 32 Uniform System of Accounts*, Report and Order (FCC 17-15), WC Docket No. 14-130 (rel. February 24, 2017) at 26

amount of support received, unless foul play is detected). To this end, the FCC and USAC must develop, via an orderly and public process, methods to identify the highest audit risks (in terms of likelihood of material repayment of funds) so that audit resources can be most efficiently expended.

Once again, we thank the Commission for its proactive approach to address these issues, and look forward to working with the Commission to further improve the regulatory environment for small companies and the communities we serve.

Respectfully submitted,

Luke Kail
Manager of Government Affairs
Small Company Coalition

Attachment

Federal Regulatory Compliance Calendar
2025

ATTACHMENT

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	
Due	**Burden (Hrs)**	**# of Pages in Filing**	**# of Pages in Instructions**	**Pre-Transformation Order Filings**	**Resulting from Transformation Order**	**Burden Hours; Filing Enacted After Transformation Order**	**Note**	**Filing Requirement Description**	***Additional Notes***
Annually	1.0	3	5	x				**FORM 473 Universal Service for Schools & Libraries Service Provider Annual Certification Form**	
Annually	12.0	Unknown	28			x		**Robocall Mitigation Database External Filing Instructions**	
Annually	8.0	1	9			x		**Specifications for the Broadband Consumer Label Machine Readable Data Files (April 2024); FCC Order = 87 pages**	
Annually	5.0	1	N/A	x				**Do Not Call Notification for Telecommunications Carriers**	
Variable due date	18.0	4	5	x				**FCC Form 474 Universal Service for Schools and Libraries Service Provider Invoice Form; filed monthly**	
N/A	2.0	Varies	N/A	x			Should review annually	**CALEA Manuals**	
N/A	1.5	9	20	x			Review as necessary	**FCC 498 SPIN and Contact Info Form**	
January	1.0	2	3	x				**FCC Form 497 – Low Income Monthly Reporting**	
January	15.0	2	66			x	Numerous calculations; testing modules; varies by size of company	**# Pages Per PMM Guide & PMM Compliance calculations; Burden hours varies, reasonable estimate included herein; could be thousands of tests included in the CSV files submitted**	
January	2.0	2	59			x	Submit CSV filing; potentially numerous numbers	**Reassigned Numbers Database filing**	
January	2.0	2	16	x				**TRS monthly payments submission; Form 431**	
January	15.0	4	7	x				**FCC Form 555 – Annual Lifeline ETC Certification Form**	
February	20.0	14	8	x				**FCC Form 502 – Numbering Resource Utilization/Forecast (July 1st – December 31st of previous year)**	
February	2.0	2	16	x				**TRS monthly payments submission; Form 431**	
February	10.0	1	21	x				**FCC Form 499Q – Telecommunications Reporting Worksheet (4th Quarter of previous year)**	
February	1.0	2	3	x				**FCC Form 497 – Low Income Monthly Reporting**	
February	2.0	2	59			x	Submit CSV filing; potentially numerous numbers	**Reassigned Numbers Database filing**	
February	2.0	1	1	x				**Mandatory Access Line Forecast data collection for September access lines**	
February	40.0	50	Parts 32/36/69	x			Number of pages varies by company. Requires Part 36, Part 69, and support work papers	**Interstate Revenue Projections (current year and subsequent two years)**	*1*
March	5.3	1	1	x				**FCC Form 507**	
March	1.0	14	8	x				**FCC Form 497 – Low Income Monthly Reporting**	
March	4.0	Varies	72			x	Based on number of locations in service area	**Broadband Data Collection; BDC availability data specifications**	
March	8.0	3	8	x			Number of pages varies by company	**CPNI Certification**	
March	6.0	1	6		x			**Form 507**	
March	2.0	2	16	x				**TRS monthly payments submission; Form 431**	
March	2.0	2	59			x	Submit CSV filing; potentially numerous numbers	**Reassigned Numbers Database filing**	
March	20.0	Varies	31			x		**HUBB filing with USAC**	
March	2.0	3	6	x				**Carrier Identification Code Report**	
March	40.0	14	14		x			**ICC / CAF Data Collection** This is phase 1 of the annual data request to be filed with NECA as part of the annual access tariff filing and also to calculate ARC and CAF ICC. NECA will review and make corrections if needed. Corrected data, if any, will need to be certified by May 28.	
March	1.6	1	1	x				**FCC Form 508 – Projected Common Line Reporting**	
March	20.0	24	9	x				**Advance Services Data Request**	
April	5.0	1	11	x			Instructions include a FAQ's and other general instructions	**Annual Accessibility Certification (14.31(b)(1))**	
April	2.0	2	16	x				**TRS monthly payments submission; Form 431**	
April	15.0	2	66			x	Numerous calculations; testing modules; varies by size of company	**# Pages Per PMM Guide & PMM Compliance calculations; Burden hours varies, reasonable estimate included herein; could be thousands of tests included in the CSV files submitted**	
April	13.5	8	40	x				**FCC Form 499A – Telecommunications Reporting Worksheet (Annual reporting for previous calendar year)**	
April	2.0	2	59			x	Submit CSV filing; potentially numerous numbers	**Reassigned Numbers Database filing**	

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	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	
April	2.0	1	40	x				**Annual International Circuit Status Report**	
April	1.0	3	6	x				**FCC Form 497 – Low Income Monthly Reporting**	
May	10.0	1	21	x				**FCC Form 499Q – Telecommunications Reporting Worksheet (1st Quarter)**	
May	2.0	2	16	x				**TRS monthly payments submission; Form 431**	
May	2.0	2	59			x	Submit CSV filing; potentially numerous numbers	**Reassigned Numbers Database filing**	
May	1.0	1	1	x				**IXC Detariff Annual Certification/Geographic Rate Averaging (§64.1900 of FCC Rules)**	
May	1.0	3	6	x				**FCC Form 497 – Low Income Monthly Reporting**	
May	1.0	2	3	x				**FCC Form 395 – Common Carrier Annual Employment Report & Discrimination**	
June	20.0	1	1		x			**Rate of Return Carrier CAF ICC Support (54.304 (d)) Any RoR carrier seeking CAF ICC support must file data for eligibility. Verify that you have supplied the necessary certification to NECA who will then submit to the FCC and USAC. This must also be filed with a state commission.**	
June	5.0	57	8		x		NECA FAQ's is 8 pages	**54.304(d)(1)** File projected CAF ICC during upcoming funding period (July 1, XX - following June 30, XX). Filing made with FCC, USAC, state commission/Tribal entity.	
June	1.0	3	3	x				**Study Area Boundary certification (due biannually)**	
June	2.0	2	16	x				**TRS monthly payments submission; Form 431**	
June	2.0	2	59			x	Submit CSV filing; potentially numerous numbers	**Reassigned Numbers Database filing**	
June	2.0	2	2		x			**51.917(f)(3) - Certify Compliance with 51.917(d)&(e)** **51.917(d)(vii) - Deplicative Recovery Certification** This filing is to certify that the calculation of the CAF ICC support was done in accordance with 51.917(d) & (e). Applies to carriers charing ARC and/or receiving ICC/CAF support	
June	1.0	3	6	x				**FCC Form 497 – Low Income Monthly Reporting**	
June	2.0	1	1	x			Filed with annual tariff/TRP filings	**Accuracy Certification** All carriers must file a certification regarding the accuracy of the tariff filing and TRP supporting materials	*2*
July	20.0	5	41		x			**Annual ETC Reporting and Form 481, including local rate floor** Various reporting requirements per 54.313.	
July	2.0	2	59			x	Submit CSV filing; potentially numerous numbers	**Reassigned Numbers Database filing**	
July	15.0	2	66			x	Numerous calculations; testing modules; varies by size of company	**# Pages Per PMM Guide & PMM Compliance calculations; Burden hours varies, reasonable estimate included herein; could be thousands of tests included in the CSV files submitted**	
July	2.0	2	16	x				**TRS monthly payments submission; Form 431**	
July	1.0	3	6	x				**FCC Form 497 – Low Income Monthly Reporting**	
July	25.5	20	Parts 32/36/54	x			Number of pages varies by company. Requires Parts 32/36 data as well as supporting work papers	**USF 16-1 (YE 12/31) – High Loop Cost Data Collection (USAC) (January 1– December 31)**	*3*
July	50.0	25	Parts 32/36/69	x			Number of pages varies by company. Requires Part 36, Part 69, and support work papers	**Interstate Separations Cost Study (January – December of prior year)**	*4*
July	5.0	1	12	x				**International Traffic Report**	
July	5.0	3	6	x				**Carrier Identification Code Report**	
August	20.0	14	8	x				**FCC Form 502 – Numbering Resource Utilization/Forecast (January 1st – June 30th of current year)**	
August	10.0	1	21	x				**FCC Form 499Q – Telecommunications Reporting Worksheet (2nd Quarter)**	
August	2.0	2	16	x				**TRS monthly payments submission; Form 431**	
August	2.0	2	59			x	Submit CSV filing; potentially numerous numbers	**Reassigned Numbers Database filing**	

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August	2.0	1	1	x				**FCC Reg Fee Election**	
August	1.0	3	6	x				**FCC Form 497 – Low Income Monthly Reporting**	
September	2.0	2	59			x	Submit CSV filing; potentially numerous numbers	**Reassigned Numbers Database filing**	
September	4.0	Varies	72			x	Based on number of locations in service area	**Broadband Data Collection; BDC availability data specifications**	
September	2.0	2	16	x				**TRS monthly payments submission; Form 431**	
September	1.0	3	6	x				**FCC Form 497 – Low Income Monthly Reporting**	
October	6.0	1	1	x				**Universal Support Use Certification (§ 54.314(d))** - Annual certification for use of federal high cost support (HCLS and ICLS)	
October	15.0	2	66			x	Numerous calculations; testing modules; varies by size of company	**# Pages Per PMM Guide & PMM Compliance calculations; Burden hours varies, reasonable estimate included herein; could be thousands of tests included in the CSV files submitted**	
October	2.0	Varies	6			x		**47 CFR 9.19**	
October	2.0	2	16	x				**TRS monthly payments submission; Form 431**	
October	2.0	2	59			x	Submit CSV filing; potentially numerous numbers	**Reassigned Numbers Database filing**	
October	1.0	3	6	x				**FCC Form 497 – Low Income Monthly Reporting**	
November	10.0	1	21	x				**FCC Form 499Q – Telecommunications Reporting Worksheet (3rd Quarter)**	
November	2.0	2	59			x	Submit CSV filing; potentially numerous numbers	**Reassigned Numbers Database filing**	
November	2.0	2	16	x				**TRS monthly payments submission; Form 431**	
November	1.0	3	6	x				**FCC Form 497 – Low Income Monthly Reporting**	
December	1.0	3	6	x				**FCC Form 497 – Low Income Monthly Reporting**	
December	2.0	2	59			x	Submit CSV filing; potentially numerous numbers	**Reassigned Numbers Database filing**	
December	2.0	2	16	x				**TRS monthly payments submission; Form 431**	
December	4.0	1	1	x				**FCC Form 509 - CAF BLS True up**	
December	16.0	4	7	x				**Lifeline Customer Recertification (54.405(e)(4))** Recertification process must be completed during the year, results to be reported on Form 555 by January 31 of the following year	
Total Burden Hours	603	391	1812	516	87				
Federal Filings	86								

	Filings in yellow do not have specific burden estimates published by the FCC and represent an estimate based on our actual experience in dealing with the filing or analysis of the rules
	Filings with this color depict the burden estimate published by the FCC

NOTE: THIS CALENDAR IS A GENERAL GUIDELINE ONLY AND MAY NOT INCLUDE EVERY REGULATORY DEADLINE. DUE DATES MAY CHANGE AND FILINGS MAY BE ADDED OR REMOVED THROUGHOUT THE YEAR. FILINGS LISTED MIGHT NOT APPLY TO ALL CARRIERS. THIS CALENDAR DOES NOT INCLUDE STATE FILING REQUIREMENTS OR NECA SETTLEMENT REPORTING REQUIREMENTS, HOWEVER IT DOES INCLUDE MANDATORY FILINGS THAT ARE REQUESTED BY AND SUBMITTED TO NECA. THE NUMBER OF PAGES OF INSTRUCTIONS IS SIGNIFICANTLY MORE THAN REPORTED ABOVE IN COLUMN "C" AS MANY PARTS AND SUBPARTS OF FCC RULES ARE NECESSARY TO PREPARE SOME OF THE FILINGS

Additional Notes:
1) This is no longer required for companies that have a) exited the NECA pool; b) have elected incentive regulation via ACAM and BDS; or c) that have elected price cap regulation
2) This is for companies filing their individual access tariff and Tariff Review Plan data
3) This is no longer required for companies that have a) exited the NECA pool; b) have elected incentive regulation via ACAM and BDS; or c) that have elected price cap regulation
4) This is no longer required for companies that have a) exited the NECA pool; b) have elected incentive regulation via ACAM and BDS; or c) that have elected price cap regulation